

**REMARKS/ARGUMENTS**

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-21 and 23-58 are pending in the present application. Claim 22 has been canceled, and claims 1-21, 23-49 and 51-58 have been amended by the present amendment.

In the outstanding Office Action, claims 7-36, 39-42 and 45-58 were rejected under 35 U.S.C. § 112, second paragraph; and claims 1-58 were rejected under 35 U.S.C. § 103(a) as unpatentable over Sisley et al. (Sisley) in view of Bushey et al (Bushey).

Regarding the rejection of claims 7-36, 39-42 and 45-58 under 35 U.S.C. § 112, second paragraph, the appropriate claims have been amended in light of the comments noted in the outstanding Office Action. Accordingly, it is respectfully requested this rejection be withdrawn.

Claims 1-58 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Sisley in view of Bushey. This rejection is respectfully traversed.

Amended independent claim 1 is directed to a customer relationship management system including a server configured to collect request information concerning a customer request, to collect customer sensitivity information concerning a sensitivity of the customer, and to provide at least one behavioral pattern example on how to interact with the customer based on the collected customer sensitivity information. Amended independent claim 8 includes similar features in a varying scope.

In a non-limiting example, Fig. 6 illustrates different behavioral pattern examples on how to interact with the customer based on the collected customer sensitivity information. For example, in the upper right corner of Fig. 6, the display includes behavioral patterns on how to respond to a friendly customer who indicates a response can be at the technician's convenience, a friendly customer who compliments the technician, and a requesting customer who requests the response be lowest in price as possible. Fig. 7A illustrates other type of behavioral patterns to use in interacting with the customer based on the customer sensitivity information.

For example, when it is determined that a customer's sensitivity type is code R<sub>1</sub> (see Fig. 5C) in that a requested time is not available, the responding person may settle the customer's dissatisfaction using the behavioral pattern and words determined such as "I am very sorry I could not visit you at the time you desired" and so on along with the general confirmation of the service request particulars (see the paragraph bridging pages 27 and 28). Thus, a technician who may not be skilled at dealing with different types of customers that are upset, friendly, etc., may be provided with behavioral patterns to better deal with the situations (see page 28, the fourth full paragraph).

The outstanding Office Action relies on Sisley as disclosing a customer relationship management system and relies on Bushy as teaching a collection server that collects information about satisfied/unsatisfied customers as claimed.

However, it is respectfully noted that Bushey merely creates separate models for customers and agents and then matches a respective customer with the most similar agent

based on the models (see col. 7, lines 38-40). Nowhere in Bushey is it disclosed that the at least one behavioral pattern is provided on how to interact with the customer. Thus, the advantages of the present invention are not achieved with the combination of Sisley and Bushey.

In addition, amended independent claim 37 includes a feature in which the customer is allowed to select a specific responding person from a list of responding persons.

Amended independent claim 39 includes similar features of a varying scope.

In a non-limiting example, Fig. 16B illustrates a graphic user interface that is displayed to the customer in which the customer enters his name, telephone number, zip code, the name of the product, the nature of the problem, etc., and then a list of available responding persons is displayed to the user (see the right side of Fig. 16D). The user may then select a particular responding person from the list.

Neither Bushey nor Sisley teach or suggest allowing the customer to select a specific responding person from a list of recommended responding persons.

Further, amended independent claim 43 and 45 also include the feature in which a list of responding persons that can respond to the customers request are displayed to the customer. In claims 43 and 45, a photograph of the responding person to the customer can also be displayed. Thus, the user may see the picture of the technician and recognize which service center he belongs thus making the customer feel more at ease with the person that will be responding to his request (e.g., responding to his home to repair a device). That is, a customer who requests service generally has no information on a corresponding technician

and thus may have a feeling of uneasiness due to a strange visitor and this may cause the customer's dissatisfaction (see page 31, the third paragraph).

The present invention solves this problem by providing the customer with the capability of directly selecting the technician to respond to their request and displaying a picture of the responding person to make the customer feel more at ease. Accordingly, the customer can feel a strong affiliation with the corresponding technician, and be free from fear due to a strange visitor, because the customer is familiar with the face of the corresponding technician (see page 35, the first full paragraph).

As noted above, Bushey merely disclose matching a model of a customer with a model of the agent (e.g., the customer may prefer a particular sales preference and this is matched with the agent – see col. 7, lines 11-40). However, Bushey does not teach or suggest displaying the information of the responding person as claimed by the present invention. Sisley also do not teach or suggest this feature.

Accordingly, it is respectfully submitted independent claims 1, 8, 37, 39, 43 and 45 patentably define over Sisley in view of Bushey.

In addition, the specification and drawings have been amended to correct minor idiomatic informalities, and no new matter has been added.

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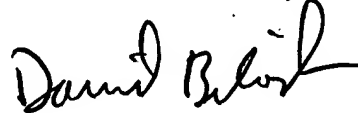
Docket No. K-0299

### **CONCLUSION**

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, **David A. Bilodeau**, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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